

STATE OF INDIANA     )  
                                  ) SS:  
COUNTY OF MARION    )

BEFORE THE INDIANA  
COMMISSIONER OF INSURANCE

CAUSE NO: 18843-AG19-1216-203

IN THE MATTER OF:                     )  
  )  
Strategic National Title Group, LLC    )  
6870 Elm St. Suite 100                 )  
McLean, VA 22101-3828                 )  
  )  
Respondent.                             )  
  )  
Type of Agency Action: Enforcement    )  
  )  
License Number: 920477                 )

**FILED**

**JAN 31 2020**

STATE OF INDIANA  
DEPT. OF INSURANCE

**FINAL ORDER**


The Enforcement Division of the Indiana Department of Insurance ("Department"), by counsel, Victoria Hastings, and Strategic National Title Group, LLC ("Respondent"), a licensed nonresident producer organization, signed an Agreed Entry which purports to resolve all issues involved in the above-captioned cause number, and which has been submitted to the Commissioner of the Indiana Department of Insurance ("Commissioner") for approval.

The Commissioner, after reviewing the Agreed Entry, which imposes a civil penalty in the amount of one thousand dollars (\$1,000), and places Respondent on probation for a period of one (1) year for the failure to timely report the administrative actions from five (5) states, finds it has been entered into fairly and without fraud, duress or undue influence, and is fair and equitable between the parties. The Commissioner hereby incorporates the Agreed Entry, attached, as if fully set forth herein, and approves and adopts in full the Agreed Entry as a resolution of this matter.

**IT IS THEREFORE ORDERED** by the Commissioner as follows:

1. Respondent's nonresident producer organization license shall be renewed, and Respondent shall pay a civil penalty in the amount of one thousand dollars (\$1,000) to the Department within thirty (30) days of the Commissioner signing this Final Order.
2. Respondent's nonresident producer organization license shall be placed on probation for a period of one (1) year beginning the date of this Final Order. During the probationary period, any violations of Title 27 of the Indiana Code will result in the Department seeking immediate revocation of Respondent's license.

1-31-2020  
Date Signed

  
Stephen W. Robertson, Commissioner  
Indiana Department of Insurance

Distribution:

Victoria Hastings, Attorney  
ATTN: Phil Holleman, Investigator  
**INDIANA DEPARTMENT OF INSURANCE**  
311 West Washington Street, Suite 103  
Indianapolis, Indiana 46204-2787

Strategic National Title Group, LLC  
ATTN: Mike Piple, CEO  
6870 Elm Street, Suite 100  
McLean, VA 22101-3828

STATE OF INDIANA )  
 ) SS:  
COUNTY OF MARION )

BEFORE THE INDIANA  
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CAUSE NO.: 18843-AG19-1216-203

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**JAN 31 2020**

STATE OF INDIANA  
DEPT. OF INSURANCE

**AGREED ENTRY**

This Agreed Entry is executed by and between the Enforcement Division of the Indiana Department of Insurance ("Department"), by counsel, Victoria Hastings, and Strategic National Title Group ("Respondent"), to resolve all issues in the above-captioned cause number. This Agreed Entry is subject to the review and approval of Stephen W. Robertson, Commissioner of the Indiana Department of Insurance ("Commissioner").

WHEREAS, on November 14, 2019, Respondent applied for a renewal of a nonresident producer organization license;

WHEREAS, Respondent failed to timely disclose five (5) administrative actions from the states of Virginia, Florida, Ohio, Louisiana and Delaware;

WHEREAS, On January 6, 2017, the Virginia Dept. of Insurance issued a Cease and Desist From Violations and levied a civil penalty in the amount of two thousand five hundred (\$2,500) dollars against Respondent due to a fiduciary violation;

WHEREAS, On September 19, 2018, the Florida Department of Insurance filed a Settlement Stipulation for Consent Order after a field investigation of Respondent, and alleged that Respondent failed to submit the statutorily mandated 2018 Title Data Call filing with the Department in a timely manner; Respondent was levied with a two thousand five hundred (\$2,500) civil penalty;

WHEREAS, On October 3, 2018, the Ohio Department of Insurance issued a Notice of Opportunity for Hearing to Respondent due to Respondent's failure to submit a complete annual review and/or claim of exemption of its escrow accounts for the review period of September 1, 2014 to August 31, 2017. On November 9, 2018, the Ohio Department of Insurance revoked Respondent's license;

WHEREAS, On March 3, 2019, after the Louisiana Department of Insurance discovered that Respondent had not reported the three administrative actions taken by Virginia, Florida, and Ohio, it issued a five hundred dollar (\$500) civil penalty against Respondent;

WHEREAS, On May 15, 2019, the Delaware Department of Insurance sent a Stipulation and Consent Order levying a civil penalty for five hundred dollars (\$500) due to Respondent failing to timely disclose administrative actions from other states;

WHEREAS, Indiana Code § 27-1-15.6-12(b)(2)(A) states, in part, that the Commissioner may levy a civil penalty and place an insurance producer organization on probation for violating an insurance law;

WHEREAS, Indiana Code § 27-1-15.6-17(a) is an insurance law that states, a producer shall report to the Commissioner any administrative action taken against the producer in another jurisdiction or by another governmental agency in Indiana not more than thirty (30) days after the final disposition of the matter;

WHEREAS, Indiana Code § 27-1-15.6-12(b)(9), states, in part, that the Commissioner may levy a civil penalty and place an insurance producer organization on probation for having an insurance producer license, or its equivalent, denied, suspended, or revoked in any other state;

WHEREAS, Mike Piple, CEO, of Strategic National Title Group, LLC, is authorized to act on behalf of Respondent and obligate it to perform in accordance with this agreement; and

WHEREAS, the Department and Respondent (collectively, the "Parties") desire to resolve this matter without the necessity of a hearing.

IT IS, THEREFORE, NOW AGREED by and between the Parties as follows:

1. The Commissioner has jurisdiction over the subject matter and the Parties to this Agreed Entry.
2. In order to avoid formal litigation in this matter, Respondent has determined that it is in their best interests to enter into this Agreed Entry. As such, Respondent acknowledges that they execute this Agreed Entry with full realization of its contents and effects.
3. This Agreed Entry is executed knowingly, voluntarily, and freely by the Parties. The Parties agree that the terms of this Agreed Entry constitute final resolution of this matter.
4. Respondent knowingly, voluntarily, and freely waives the right to a public hearing on this matter, including the right to appear in person

before the Commissioner, present evidence, cross-examine witnesses, and present arguments.

5. Respondent knowingly, voluntarily, and freely waives the right to judicial review of this matter or otherwise appeal or challenge the validity of this Agreed Entry.
6. Respondent knowingly, voluntarily, and freely waives, releases, and forever discharges all claims or challenges, known or unknown, against the Department, its Commissioner, employees, agents, and representatives, in their individual and official capacities, that arise out of or are related to the Agreed Entry or Final Order, including but not limited to any act or omission as part of the underlying audit, investigation, negotiation, or approval process.
7. Respondent agrees to pay a civil penalty in the amount of one thousand (\$1,000) dollars to the Department within thirty (30) days after the Commissioner signs the Final Order adopting this Agreed Entry.
8. Respondent's nonresident producer organization license shall be placed on probation for a period of one (1) year, beginning the date the Commissioner signs the Final Order adopting this Agreed Entry. During the probationary period any violation of Title 27 of the Indiana Code will result in the Department seeking immediate revocation of Respondent's license.
9. Respondent has carefully read and examined this Agreed Entry and fully understands its terms.

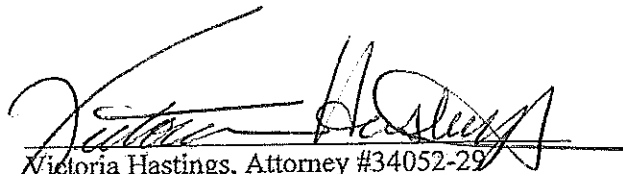
10. Respondent has had the opportunity to have this Agreed Entry reviewed by legal counsel of its choosing, at its own expense, and is aware of the benefits gained and obligations incurred by the execution of this Agreed Entry. Respondent understands and agrees that the Department cannot give it legal advice.
11. Respondent has entered into this Agreed Entry knowingly, voluntarily, and freely, and has not been subject to duress, coercion, threat, or undue influence.
12. This Agreed Entry constitutes the entire agreement between the Parties, and no other promises or agreements, express or implied, have been made by the Department or by any employee, director, agent or other representative thereof to induce Respondent to enter this Agreed Entry.
13. The Department agrees to accept Respondent's compliance with the terms of this Agreed Entry as full satisfaction of this matter, and warrants and represents that so long as Respondent complies with the terms of this Agreed Entry, the Department will not bring any further action against Respondent based on the facts that gave rise to this Agreed Entry.
14. In the event the Department finds there has been a breach of any of the provisions of this Agreed Entry, the Department may reopen this matter and pursue alternative action pursuant to Indiana Code § 27-1-15.6-12.
15. Respondent waives any applicable statute of limitations for purposes of any enforcement of the terms and conditions of this Agreed Entry.

16. Respondent acknowledges that this Agreed Entry may be admitted into evidence in any judicial or administrative proceeding against Respondent to enforce the terms and conditions contained herein.
17. Respondent understands that this Agreed Entry resolves only the matter pending with the Department and does not affect any criminal prosecution or civil litigation that may be pending or hereinafter commence against Respondent.
18. This Agreed Entry does not in any way affect the Department's authority in future audits, investigations, examinations, negotiations, or other complaints involving Respondent.
19. It is expressly understood that this Agreed Entry is subject to the Commissioner's acceptance and has no force or effect until such acceptance is evidenced by the entry of a Final Order by the Commissioner.
20. Should this Agreed Entry not be accepted by the Commissioner, it is agreed that presentation to, and consideration of this Agreed Entry by the Commissioner shall not unfairly or illegally prejudice the Commissioner or Respondent from further participation in or resolution of these proceedings.
21. If this Agreed Entry is accepted by the Commissioner, it will become part of Respondent's permanent record and may be considered in future actions brought by the Department or any other regulator against Respondent. It is further understood that, if accepted by the

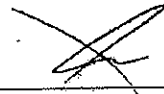
Commissioner, this Agreed Entry and resulting Final Order are public records pursuant to Indiana Code § 4-21.5-3-32 that may not be sealed or otherwise withheld from the public, and may be reported to the National Association of Insurance Commissioners and published on the Department's website as required.

22. Respondent acknowledges that this is an Administrative Action it may be required to report to other jurisdictions in which they are licensed and on future licensing applications.

1/28/2020  
Date Signed

  
Victoria Hastings, Attorney #34052-29  
Indiana Department of Insurance

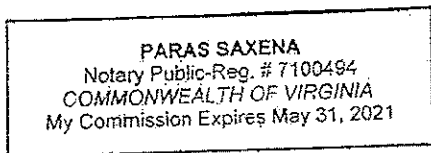
01/29/2020  
Date Signed

  
Mike Piple, CEO  
Strategic National Title Group, LLC, Respondent

STATE OF VIRGINIA )  
COUNTY OF FAIRFAX ) SS:

Before me a Notary Public for Virginia/Fairfax County, State of Virginia personally appeared Mike Piple, CEO of Strategic National Title Group, LLC, and being first duly sworn by me upon his oath, says that the facts alleged in the foregoing instrument are true.

Signed and sealed this 24<sup>th</sup> day of January, 2020.



Renelle  
Signature  
Paras Saxena  
Printed

My Commission expires: 05.31.2021

County of Residence: Fairfax

Return executed originals to:  
INDIANA DEPARTMENT OF INSURANCE  
Enforcement Division, Suite 103  
311 West Washington Street  
Indianapolis, IN 46204-2787  
317/234-5885 - telephone  
317/234-2103- facsimile